

States Government

Department of Energy

2912 RF 92

DUE  
DATE 7-30-92ACTION *Kersh*  
DIST. LTR ENC

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BRANCH, D.B.	
BURLINGAME, A.H.	
CARNIVAL, G.J.	
COPP, R.D.	
CROUCHER, D.W.	
DAVIS, J.G.	
EVERED, J.E.	<input checked="" type="checkbox"/>
FERRERA, D.W.	
GOODWIN, R.	
HANNI, B.J.	
HEALY, T.J.	
HILBIG, J.G.	
IDEKER, E.H.	
KERSH, J.M.	<input checked="" type="checkbox"/>
KIRBY, W.A.	
KRIEG, D.	
KUESTER, A.W.	
LEE, E.M.	
MAJESTIC, J.R.	
MARX, G.E.	
MORGAN, R.V.	
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TALLMAN, K.G.	
WIEBE, J.S.	
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*Greenwood* ☒*Shabba F* ☒*Wardle M* ☒CORRES CONTROL ☒ ☒  
TRAFFICReviewed for Addressee  
Corres. Control RFP*CBM* 6-3-92

DATE BY

Ref Ltr. #

## Memorandum

JUN 3 3 17 PM '92

Rocky Flats Office

JUN 02 1992

ERD:SG:6042

OU1 Draft Remedial Investigation Report

J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

We are in receipt of your May 12, 1992 memorandum (92-RF-5064), concerning data deficiencies in the Draft Operable Unit 1 (881 Hillside) Remedial Investigation (RI) Report due to EPA and CDH on July 30, 1992. As was indicated in this and previous memoranda and discussions with your staff, the laboratory turnaround and subsequent data validation delays will postpone completion of the Draft RI Report. As you are aware, we have received a letter from EPA/CDH dated May 7, 1992, concerning submittal of an incomplete RI Report. The EPA/CDH letter stated that :

"...mere submittal of a document does not constitute meeting a milestone under the terms of our agreement. EPA and CDH will consider submittal of a Draft Phase III RFI/RI Report which lacks a **full presentation and analysis of the complete Phase III RFI/RI data set** as equivalent to not submitting a report at all; a clear failure to meet the milestone and an IAG violation subject to stipulated penalties. ... One specific impact of particular concern to us is that the lack of Phase III RFI/RI data will result in an inadequate and incomplete human health risk assessment and environmental evaluation..."

A request for schedule extension for the Draft RI Report was delivered to EPA/CDH on May 21, 1992, and a meeting was held with EPA/CDH to discuss the request. The outcome of the discussions with EPA/CDH on a possible extension on the schedule was not favorable. Regardless of the outcome of our request for extension, we concur with the EPA/CDH position and instruct you to submit the Draft RI Report **only** when the Phase III RI data is received and analyzed. We further instruct you to delay submitting the remaining Baseline Risk Assessment technical memoranda required by Section VII.D.1, Attachment 2 of the IAG. These memoranda include: (1) contaminant identification and documentation (resulting in COCs for the Human Health Risk Assessment); (2) fate and transport modeling; and (3) toxicity assessment and documentation (for substances lacking an EPA toxicity value for which DOE wishes to develop its own toxicity value). Note that the technical memoranda for toxicity assessment and documentation will not be necessary if DOE is not developing its own toxicity values. Further discussion will be necessary between DOE/RFO/ERD and EG&G to determine if the work on cancer potency slope factors by ORNL constitutes DOE developing its own toxicity values.

ADMIN RECORD

A-DU01-000371

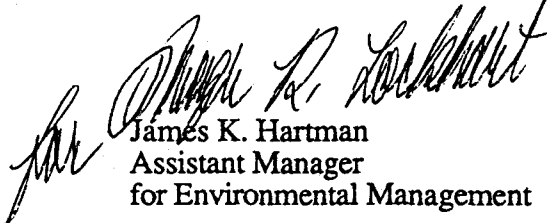
J. M. Kersh  
ERD:SG:6042

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JUN 02 1992

Failure to receive a schedule extension from EPA/CDH makes us subject to stipulated penalties. Therefore, you need to take appropriate corrective action on the problems causing delay of Phase III data and data validation in order to minimize the time between the IAG milestone of July 30, 1992, and when we can transmit the Draft RI Report.

If you have any questions, please contact Scott Grace at extension 7199.

  
James K. Hartman  
Assistant Manager  
for Environmental Management

cc:

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